

5,664,926); claims 2 and 8 stand rejected under §103(a) as being unpatentable over *Iizuka* and *Sussman et al.* and further in view of *Umatate et al.* (U.S. Patent No. 5,243,377); and claims 4 and 6 stand rejected under §103(a) as being unpatentable over *Iizuka* and *Sussman et al.* and further in view of *Rosenquist* (U.S. Patent No. 6,082,949). Favorable reconsideration of this application is requested in view of the above amendment to the claims and the following remarks.

Applicants have amended the specification to indicate that there is no Figure 3C as indicated by the Examiner. Applicants have also amended claim 1 to more clearly define the function of the bays and the storing system, support of which is found in the specification (*e.g.* page 2, lines 24-26; page 5, lines 24 *et Seq.* and Figures 3A-3B). Applicants have amended claims 2, 3, 8, 9 and 11 to clarify some of the claim elements and correct typographical errors. New claim 13 has been included support for which is found in the specification on page 6, lines 8-10.

The Office Action alleges that the specification is not enabling under §112 in the teaching of how the sorter protects the reticles from foreign particles, orients the reticles and stabilizes the reticles during the sorting process (Paper 2, page 2). Applicant respectfully traverses the §112 rejection because the specification does teach protecting, orienting and stabilizing the reticles even though these aspects of the invention are not being claimed. Applicant notes that it is a well-known principle that the failure to expressly discuss conventional aspects of an unclaimed feature of an invention is not a violation of the enablement requirement of §112. Notwithstanding, the specification does teach that the reticles are protected from the external environment and from dust while they are in docking area 390 and housed in cassettes 320 (Fig. 3A-3B; page 6, line 13 *et Seq.*). The reticles are also oriented and stabilized with a sorting arm (page 6, lines 3-4) that is conventionally known, as recognized by the Office Action, in the cited prior art. Applicant agrees that the cited background art is more detailed in its description and therefore one skilled in the art would be knowledgeable of the conventional aspects of the invention. In view of the foregoing discussion, Applicants maintain that the specification as written is enabling and provides sufficient support for the claimed invention.

Regarding the §103 rejection of claims 1, 3, 5, 7 and 9-12, Applicants respectfully submit that the combination of *Iizuka* and *Sussman* does not render obvious the claimed invention for failing to teach or suggest all of the limitations of the claimed invention. In particular, the

asserted combination does not teach or suggest the claimed invention including the limitations directed to the sorting system that sorts the reticles within the cassette (*e.g.*, page 6, lines 5-12). A closer review of the cited portion of *Sussman* discloses orienting the cassette for loading and unloading of the entire cassette and using the positional sensors for this procedure (col. 9, lines 9-14; col. 10, lines 48-62). In addition, the cassettes are oriented with the opening upward to facilitate substrate loading for an operator and move downward for processing (see Figure 2A versus Figure 3A). Further, the stated motivation of modifying the primary reference to provide the exposure tools access to a greater number of reticles and to reduce time/energy of interchanging reticle cassettes by an operator does not appear to be evidenced in the cited art.

With respect to the rejection of claims 2 and 8 as being unpatentable over *Iizuka* and *Sussman et al.* and further in view of *Umatate*, Applicants respectfully submit that the combination of *Iizuka/Sussman* with *Umatate* does not render obvious the claimed invention for failing to teach or suggest all of the limitations of the claimed invention. Contrary to the Office Action, the changing and aligning of masks as part of the *Umatate* system does not correspond to the controller that controls sorting of the reticles within the cassettes and within the bays as in Applicant's claimed invention. Changing and aligning masks is a different and less complex operation in the lithographic process than is having to sort reticles within the cassette. In addition, *Umatate* fails to provide any teaching on how its system is configured to sort reticles in response to a command from the host system.

With respect to the inspection system, Applicant contends that the inspection system of *Umatate* that measures line widths of resist patterns on exposed and developed wafers (col. 29-34) does not correspond to the inspection of the actual reticle pattern for flaws. Measuring line widths only indicate that some step in the process is flawed and not that the reticle used is flawed.

Finally, the stated motivation for modifying *Iizuka/Sussman* with *Umatate* conflicts with the stated objective of *Umatate*. The objective of the controller system of *Umatate* is to operate independently of the host computer (col. 3, lines 2-5) in order to reduce the processing burden on the host computer of having to control the lithographic process (col. 2, lines 59 et Seq.). The stated motivation in the Office Action, on the other hand, suggests that the controller system be

directly controlled by the host system. Finally, the stated motivation does not appear to be evidenced by the prior art.

With respect to claims 4 and 6 as being unpatentable over *Iizuka* and *Sussman* and further in view of *Rosenquist*, Applicants respectfully submit that the asserted combination does not render obvious the claimed invention for failing to teach or suggest all of the limitations of the claimed invention. In particular, the asserted combination does not teach or suggest the use of the arm to sort the reticles within the cassette; instead, only slot position information is gathered to track the wafers in their respective slots (col. 56-66). Further, the stated motivation for modifying *Iizuka/Sussman* to provide greater precision during the inspection process and stability during the sorting process does not appear to be evidenced in the cited art.

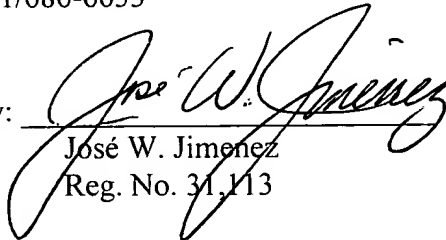
In view of the remarks above, Applicants believe that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is encouraged to contact the undersigned at (651) 686-6633.

Respectfully submitted,

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